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July 10, 2017

BY ECF & FAX

Honorable Naomi Reice Buchwald
United States District Court
500 Pearl Street
New York, New York 10007

Re: Tygee Barnhart et anos. v. The City of New York et anos.
15CV 5985(NRB)

Your Honor:

I am associated with the firm of Michelstein & Associates, PLLC, attorneys for the plaintiffs in the captioned matter. Assistant Corporation Counsel Paul H. Johnson represents the defendants. I am writing on behalf of all parties in compliance with Your Honor's direction to file a status update on July 10, 2017.

The plaintiffs in this action seek damages under 42 U.S.C. §1983 for violation of their civil rights based on false imprisonment, unreasonable strip searches, and malicious prosecution, and under state tort law for false imprisonment, assault and battery, and malicious prosecution.

The parties have engaged in extensive settlement discussions and require additional time to either reach a settlement agreement or complete discovery. Your Honor had previously set deadlines of May 19, 2017 for fact discovery and June 30, 2017 for expert disclosure. Because of the settlement negotiations and other obligations of counsel for both sides, discovery has not been completed. The parties exchanged initial disclosure and the plaintiffs responded to the defendants' interrogatories and document demands and served interrogatories and document demands on the defendants. The depositions of two of the plaintiffs have been conducted. Depositions of the defendants are outstanding. In addition, the defendants anticipate an application for an order directing the deposition of the third plaintiff, who currently is incarcerated in New Jersey.

The parties therefore jointly respectfully request, with other obligations and summer vacation schedules in mind, that Your Honor set the following new dates for the completion of discovery:

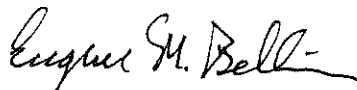
Honorable Naomi Reice Buchwald

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Fact discovery to be completed by: September 29, 2017
Expert discovery to be completed by: November 17, 2017

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eugene M. Bellin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Eugene M. Bellin

EMB:b

cc: Paul H. Johnson, Esq. (by ECF & Fax)